

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 0:25-cv-60646-LEIBOWITZ

BYOPLANET INTERNATIONAL, LLC,
Plaintiff,

v.

JARED KNECHT,
Defendant.

_____ /

RESPONSE TO ORDER TO SHOW CAUSE

COMES NOW, undersigned counsel James Martin Paul, on behalf of Plaintiff ByoPlanet International, LLC, and respectfully submits this Response to the Court's Order to Show Cause entered on May 28, 2025 [ECF No. 13], and states:

1. Introduction and Acknowledgment of Court's Order

Undersigned counsel acknowledges the Court's concern regarding the citations and quotations contained in Plaintiff's response to Defendant's Motion to Dismiss [ECF No. 10]. The Court's role in ensuring the accuracy and integrity of filings is vital, and counsel does not take the Court's directive lightly.

2. Counsel's Inadvertent Reliance on Drafted Language

The specific citations and quotes in question were inadvertently derived from internal draft text prepared using generative AI research tools designed to expedite legal research and brief drafting. These tools, while commonly used by legal practitioners, have known limitations, including the possibility of producing fictitious citations. Unfortunately, those limitations materialized in the instant response, and proper cross-verification was not conducted prior to filing.

3. No Intentional Misrepresentation

At no time did undersigned counsel knowingly or intentionally fabricate, misrepresent, or distort legal authority to the Court. The errors in the brief were the result of negligence in proofreading and citation verification, not a calculated attempt to deceive the Court.

4. Corrective Measures Taken

Upon being made aware of the issue through Defendant's Reply and the Court's Order, counsel has taken the following steps:

- Reviewed the entire filing [ECF No. 10] to identify all potentially inaccurate citations.
- Implemented new internal protocols requiring cross-referencing all legal citations with official case law databases (Westlaw/Lexis).
- Suspended the use of any AI-drafted legal content unless fully verified and human-edited.

5. Professional Responsibility and Candor to the Tribunal

Counsel deeply respects the ethical obligations imposed by the Rules Regulating The Florida Bar, including Rule 4-3.3 (Candor Toward the Tribunal) and Rule 4-8.4 (Misconduct). Undersigned counsel accepts responsibility for the oversight and affirms that such conduct will not occur again.

6. Request for Leniency and Continued Representation

Given the absence of intentional bad faith, the prompt efforts to correct the filing, and the absence of any prior discipline, counsel respectfully requests that the Court refrain from imposing sanctions or disqualification. Counsel remains committed to upholding the highest standards of legal professionalism and apologizes for the time and resources expended by the Court and opposing counsel.

CONCLUSION

For the foregoing reasons, undersigned counsel respectfully requests that the Court find that there was no intentional misrepresentation made to the Court, accept this response as a good faith explanation, and allow counsel to continue representation in this matter without further sanction.

Dated: May 30, 2025

Respectfully submitted,

JUSTICE LAW GROUP, LLP

By: /s/ James M. Paul

James M. Paul, Esq.

Florida Bar No. 1010819

850 SE 8th Avenue, Fort Lauderdale, FL
33316

Tel: (917) 562-9607

Email: jpaul@justicelawgroup.ai